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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING**

9 PAMELA A. FRANKS and BILLY L. FRANKS,)
wife and husband,)
10 Plaintiffs,) NO. 21-2-00989-8 SEA
11 vs.)
12) COMPLAINT FOR DAMAGES
13 TARGET CORPORATION, a foreign)
corporation,)
14 Defendant.)
15

COME NOW the plaintiffs, Pamela A. Franks and Billy L. Franks, wife
and husband, by and through their attorney Lance M. Hester of the Hester Law Group,
Inc., P.S., and for a cause of action, state as follows:

I

The Court has jurisdiction over the subject matter and the parties hereto.

II

At all times relevant hereto, plaintiff Pamela A. Franks and Billy L. Franks were a married couple, constituting a marital community under the laws of the State of Washington and residents of Pierce County, Washington.

COMPLAINT FOR DAMAGES - 1

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III.

Defendant Target Corporation is a corporation organized and existing under the laws of the State of Minnesota with a principal place of business at 1000 Nicollet Mall, Minneapolis, Hennepin County, Minnesota. Defendant Target Corporation does business in the State of Washington and is the owner of the Target Store located at 1401 Second Avenue, Seattle, King County, Washington.

IV.

On or about the 31st day of October, 2019, the plaintiffs, Pamela A. Franks and Billy L. Franks were shopping at the Target Store at 1401 Second Avenue, Seattle, King County, Washington.

V.

While shopping in the toy section, plaintiff Pamela A. Franks, a business invitee, slipped on a hanger on the floor and fell, hitting her head on the floor and injuring her left foot.

VI.

The proximate cause of the incident of October 31, 2019 described above, and the resulting injuries to plaintiff Pamela A. Franks was the negligence and carelessness of the defendant in failing to properly monitor for dangerous conditions and maintain a safe environment for those shopping in the store.

VII.

As a direct and proximate result of the negligence and carelessness of the defendant, plaintiff Pamela A. Franks sustained injuries to her person. Further, she has been forced to undergo medical treatment as a result thereof and may be required to

COMPLAINT FOR DAMAGES - 2

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undergo additional medical treatment in the future. Additionally, the plaintiffs have
incurred and will incur expenses associated with said treatment, the exact sums of which
are unknown at this time.

X.

As a direct and proximate cause of the negligence of the defendant herein,
plaintiff Pamela A. Franks has sustained pain and suffering, medical and other expenses,
lost wages and loss of earning capacity in an amount to be proven at the time of trial.

XI.

As a direct and proximate result of the negligence and carelessness of defendant,
plaintiff Billy L. Frank has been deprived of the love, support, affection, care, services,
companionship, society and consortium of Pamela A. Franks, his wife, all to his damage,
as well as physical and mental anguish, pain and discomfort.

WHEREFORE, plaintiffs, Pamela A. Franks and Billy L. Franks, pray for
judgment against the defendant for such sums as may be shown to be incurred for
medical and physical therapy expenses; drugs and other necessary expenses; lost earnings
in the past, present and future; loss of earning capacity; loss of consortium, general
damages; together with costs, attorney's fees and such further relief as this court may
deem just and proper.

DATED THIS 20th day of January, 2021.

HESTER LAW GROUP, INC., P.S.
Attorneys for Plaintiffs

By:



Lance M. Hester
WSB# 27813

COMPLAINT FOR DAMAGES - 3

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